

HONORABLE BARBARA J. ROTHSTEIN

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON**

ROBERT F. KENNEDY, JR., a citizen of  
New York, JOSEPH MERCOLA, M.D., a  
citizen of Florida, RONALD CUMMINS, a  
citizen of Minnesota, and CHELSEA  
GREEN PUBLISHING, INC., a Vermont  
Corporation,

Plaintiffs,

v.

U.S. Senator ELIZABETH WARREN,

Defendant(s).

No. 21-cv-01508-BJR

JOINDER IN MOTION AND  
CONSOLIDATED  
MEMORANDUM OF  
POINTS AND AUTHORITIES IN  
OPPOSITION TO PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION

Noted for: January 14, 2022

Defendant Senator Elizabeth Warren ("Senator Warren"), in her individual capacity, hereby joins in the opposition to Plaintiffs' Motion for Declaratory and Injunctive Relief Against Defendant in her Official Capacity ("Motion") filed by counsel for Senator Warren in her official capacity (Dkt. #30). Plaintiffs' Motion, by its title, is directed at Senator Warren in her official capacity only and thus does not seek any relief against Senator Warren in her individual capacity. That said, the undersigned counsel for Senator Warren, who represent the senator in her individual capacity, file this joinder in support of the arguments made in opposition to the Motion.

JOINDER IN OPPOSITION TO PLAINTIFFS'  
MOTION FOR PRELIMINARY INJUNCTION  
(NO. 21-CV-01508-BJR) - 1

ELIAS LAW GROUP  
1700 Seventh Ave, Suite 2100  
Seattle, WA 98101  
(206) 656-0176

Dated: January 10, 2022

**ELIAS LAW GROUP LLP**

By /s/ William Stafford

William B. Stafford

WSBA No. 39849

Lindsay McAleer

WSBA No. 49833

**Elias Law Group LLP**

1700 Seventh Ave, Suite 2100

Seattle, WA 98101

(206) 656-0176

(206) 656-0235

BStafford@elias.law

LMcAleer@elias.law

Elizabeth Frost\*

Melinda Johnson\*

**Elias Law Group LLP**

10 G Street NE, Suite 600

Washington, DC 20002

(202) 968-4513

(202) 968-4674

EFrost@elias.law

MJohnson@elias.law

*\* Admitted pro hac vice*

*Attorneys for Defendant Senator Elizabeth  
Warren in her individual capacity*

**CERTIFICATE OF SERVICE**

I, William B. Stafford, certify under penalty of perjury that on January 10, 2022, a copy of the foregoing was sent via the Court's electronic filing system to the following:

Nathan J. Arnold, WSBA #45356  
Nathan@CAJLawyers.com  
R. Bruce Johnston, WSBA #4646  
Bruce@rbrucejohnston.com  
ARNOLD & JACOBOWITZ, PLLC  
2701 First Avenue, Suite 200  
Seattle, WA 98121

**By: s/ William Stafford**  
William B. Stafford  
WSBA No. 39849  
**Elias Law Group LLP**  
1700 Seventh Ave, Suite 2100  
Seattle, WA 98101  
(206) 656-0176  
BStafford@elias.law